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8 *Attorney for Defendant, Jan Rouven Fuechtener*

6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 JAN ROUVEN FUECHTENER,

12 Defendant.

CASE NO.: 2:16-CR-100-GMN-CWH

**STIPULATION TO CONTINUE
REPLY DEADLINE**

13 IT IS HEREBY STIPULATED AND AGREED, by and between Elham Roohani and Lisa
14 C. Cartier-Giroux, Assistant United States Attorneys, counsel for the United States of America, and
15 Karen A. Connolly, counsel for Defendant JAN ROUVEN FUECHTENER, that the deadline for
16 Defendant's Reply to Government's Response to Motion to Withdraw Guilty Plea currently
17 scheduled for August 18, 2017, be continued for 10 days.

18 This Stipulation is entered into for the following reasons:

19 1. The parties agree to the continuance for the following reasons: The Defendant needs
20 more time to reply to Government's Response to Defendant's Motion to Withdraw Plea.

21 2. The additional time requested herein is not sought for purposes of delay.

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3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

DATED this 14th day of August, 2017.

KAREN A. CONNOLLY, LTD.

DANIEL G. BOGDEN
United States of America

/s/ Karen A. Connolly
KAREN A. CONNOLLY
Counsel for Jan Rouven Fuechtener

/s/ Elham Roohani
ELHAM ROOHANI
LISA C. CARTIER-GIROUX
Assistant United States Attorneys
Counsel for Plaintiff

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 JAN ROUVEN FUECHTENER,

7 Defendant.

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**FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER**

8 **FINDINGS OF FACT**

9 Based on the Stipulation of counsel, and good cause appearing therefore, the Court finds that:

- 10 1. The parties agree to the continuance for the following reasons: The Defendant needs
11 more time to reply to Government's Response to Defendant's Motion to Withdraw Plea.
12 2. The additional time requested herein is not sought for purposes of delay.
13 3. Additionally, denial of this request for continuance could result in a miscarriage of
14 justice.

15 For all of the above-stated reasons, the ends of justice would best be served by a continuance
16 of the reply deadline.

17 **CONCLUSIONS OF LAW**

18 The ends of justice served by granting said continuance outweigh the best interest of the
19 public and the defendant in a speedy trial, since the failure to grant said continuance would be
20 likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the
21 opportunity within which to be able to effectively and thoroughly prepare for sentencing, taking
22 into account the exercise of due diligence.

23 The continuance sought herein is excusable under the Speedy Trial Act, title 18, United States
24 Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section
25 3161(h)(7)(B(i), (iv).

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ORDER

IT IS THEREFORE ORDERED that Defendant's reply is due August 28, 2017.

DATED this 17 day of August 2017.


UNITED STATES DISTRICT JUDGE